

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF SOUTH CAROLINA**

**In Re:** )  
Terry Wayne Strickland and Mattie ) Bankruptcy Case No. 20-02804-jw  
Charlene Strickland, )  
Debtor. ) Chapter 12  
 )  
 )

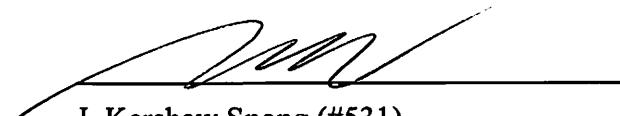
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**OBJECTION TO MOTION FOR RELIEF FROM AUTOMATIC STAY**

J. Kershaw Spong, the Chapter 12 Trustee, hereby objects to the Motion for Relief from the Automatic Stay filed by Harvey Fertilizer and Gas Co. on October 16, 2020, on the following grounds:

1. The Trustee believes that the relief sought is premature at this stage of the case.
2. After discussions with the Debtors and Debtors' attorney, the Trustee believes Debtors are prepared to engage in significant reductions of operations by orderly liquidation under the supervision of the Trustee and the Court pursuant to 11 U.S.C. §1222(b)(8).
3. While acknowledging there have been multiple bankruptcy filing by the Debtors, the Trustee has seen no evidence of fraud or deliberate delay. Some of the property subject to Harvey Fertilizer and Gas Co.'s motion may be necessary for an effective reorganization.

WHEREFORE, the Trustee prays the Court deny the relief requested by Harvey Fertilizer and Gas Co. until such time as the Debtors, Trustee, Creditors, and any other party in interest have an opportunity to propose a reorganization plan.



J. Kershaw Spong (#531)  
Chapter 12 Trustee  
P.O. Box 11449  
Columbia, SC 29211  
kspong@robinsongray.com

Columbia, South Carolina

October 21, 2020

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

In Re: ) Bankruptcy Case No. 20-02804-jw  
 )  
Terry Wayne Strickland and Mattie ) Chapter 12  
Charlene Strickland, )  
 ) CERTIFICATE OF SERVICE  
Debtor. )  
 )

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This is to certify that I, Melissa H. White, a Paralegal with the law firm of Robinson Gray Stepp & Laffitte, LLC, have this day caused to be served upon the person(s) named below the **Objection to Motion for Relief from Stay** in the foregoing matter by placing a copy of same in the United States Mail, first class with postage prepaid, in an envelope addressed as follows:

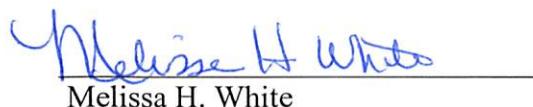
Terry Wayne Strickland  
Mattie Charlene Strickland  
6470 Strickland Road  
Green Sea, SC 29545

Reid Smith  
Bird & Smith, PA  
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Amy H. Wooten, Esquire  
Ward and Smith, P.A.  
Post Office Box 33009  
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Dated at Columbia, South Carolina this 21<sup>st</sup> day of October, 2020.

  
Melissa H. White